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BARBARA T. HOFFMAN

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December 8, 2011

Via Messenger

Honorable Judge William H. Pauley III
United States District Judge
Daniel Patrick Moynihan
United States Courthouse, Courtroom 11D
500 Pearl Street
New York, NY 10007

Application granted.

The conference scheduled for Dec. 21, 2011
is adjourned to Jan. 13, 2012 at 11:15 a.m.

The parties are directed to submit pre-motion letters by
Jan. 6, 2012.

SO ORDERED: U.S.D.J.

WILLIAM H. PAULEY III U.S.D.J. 12/13/11

Re: Agence France Presse v. Daniel Morel, No. 10-cv-2730 (WHP) (MHD) (SDNY)

Dear Judge Pauley:

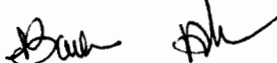
I represent the defendant and counterclaim-plaintiff Daniel Morel in the above-captioned case.

This afternoon, I received a scheduling order with respect to a pre-motion conference on a motion for summary judgment anticipated in this action by all parties for December 21st. Mr. Kaufman has informed counsel via e-mail that he is not available on December 21st, and I am also not in New York City on that date, or for the entire week of December 19th based on long-standing commitment out of the city.

I have attempted to contact other counsel to find a suitable date and while I have not yet heard from Mr. Kaufman, it appears that both Mr. Rosenfeld and I are available at any time on December 27th. I am also available the rest of that week, but Mr. Rosenfeld is not available.

I would therefore respectfully request that the conference scheduled for December 21st, be adjourned to a mutually acceptable time to the Court and counsel.

Respectfully submitted,


Barbara Hoffman

cc: Joshua Kaufman
James Rosenfeld

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 12/14/11
